

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Shakiyla Carter Individually and as	:	
as Personal Representative/	:	CIVIL ACTION
Administrator of the Estate of	:	
Richard Carter, deceased,	:	
Plaintiff	:	NO. 1:23-cv-01867-KM-DFB
	:	
v.	:	
	:	JURY TRIAL DEMANDED
Dauphin County d/b/a Dauphin	:	
County Prison, et.al.,	:	
Defendants	:	

DEFENDANTS, DAUPHIN COUNTY AND TSAURAYI DEREDZA'S
MOTION FOR EXTENSION OF TIME TO ALL CASE
MANAGEMENT ORDER DEADLINES

Defendants, Dauphin County d/b/a Dauphin County Prison and Tsauryai Deredza, respectfully request this Honorable Court for a forty-five (45) day extension of all case management deadlines outlined in the current Case Management Order (DOC 78) dated May 21, 2025. In support of their Motion, Moving Defendants state as follows:

1. On May 21, 2025, this Honorable Court issued a revised Case Management Order (DOC 78) setting a discovery deadline of July 18, 2025, along with other deadlines.

2. Since May 2025, the Parties have actively engaged in exchanging and completing written discovery as well as scheduling and taking fourteen (14) depositions to date.

3. Currently, Moving Defendants need to schedule a couple more depositions to complete discovery.

4. As stated previously, the parties are currently working under the Case Management Order (DOC 78) dated May 21, 2025, with the following deadlines:

- a. Fact Discovery: July 18, 2025
- b. Plaintiff's Expert Reports: August 15, 2025
- c. Defendants' Expert Reports: September 16, 2025
- d. Supplemental Expert Reports: October 7, 2025
- e. Dispositive Motions and Supporting Briefs: December 5, 2025

5. All parties concur with this motion.

6. Accordingly, Moving Defendants request a forty-five (45) day extension of all current Case Management Deadlines as follows:

- a. Fact Discovery: September 1, 2025
- b. Plaintiff's Expert Reports: September 29, 2025
- c. Defendants' Expert Reports: October 31, 2025
- d. Supplemental Expert Reports: November 7, 2025
- e. Dispositive Motions and

Supporting Briefs:

January 19, 2026

WHEREFORE, Defendants, Dauphin County d/b/a Dauphin County Prison and Tsauryi Deredza, respectfully request that the Court grant their Motion for Extension of Time to All Case Management Order Deadlines by forty-five (45) days.

Respectfully submitted,

Lavery Law

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d/b/a Dauphin County Prison and Tsauryi
Deredza*

DATE: July 10, 2025

CERTIFICATE OF SERVICE

I, Cathleen A. Sheaffer, an employee with the law firm of Lavery Law, do hereby certify that on this 10th day of July, 2025, I served a true and correct copy of Defendants, Dauphin County d/b/a Dauphin County Prison and Tsauryi Deredza's Motion for Extension of Time to All Case Management Order Deadlines via ECF to counsel of record:

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s/ Cathleen A. Sheaffer
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